

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JEEUN FRIEL, Individually and on behalf of  
all others similarly situated,

Plaintiff,

-against-

DAPPER LABS, INC. and ROHAM  
GHAREGOZLOU,

Defendants.

Case No. 1:21-cv-05837-VM

**ORAL ARGUMENT  
REQUESTED**

**NOTICE OF MOTION**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss, Request for Judicial Notice in Support of Defendants' Motion to Dismiss pursuant to Fed. R. Evid. 201(b), and Declaration of Erin Zatlin in Support of Defendants' Request for Judicial Notice, Defendants Dapper Labs, Inc. and Roham Gharegozloou will move this Court, before the Honorable Victor Marrero, at Daniel Patrick Moynihan U.S. Courthouse, 500 Pearl Street, Room 2260, New York, New York, 10007, on a date and time to be determined by the Court, for an Order, under Fed. R. Civ. P. 12(b)(6), dismissing with prejudice the claims asserted against them in this action, taking judicial notice of the incorporated documents, and granting such other relief as the Court deems just and proper.

Defendants request oral argument.

Dated: San Francisco, California  
August 30, 2022

Respectfully submitted,

PAUL HASTINGS LLP

/s/ Kenneth P. Herzinger

Kenneth P. Herzinger  
Sean D. Unger (*Pro Hac Vice*)  
Erin Zatlin (*Pro Hac Vice*)  
101 California Street, 48th Floor  
San Francisco, CA 94111  
Tel: 415-856-7000  
kennethherzinger@paulhastings.com  
seanunger@paulhastings.com  
erinzatlin@paulhastings.com

Zachary S. Zwillinger  
200 Park Avenue  
New York, NY, 10166  
Tel: 212-318-6000  
zacharyzwillinger@paulhastings.com

*Attorneys for Defendant Dapper Labs, Inc.  
and Roham Gharegozloou*